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KITSAP COUNTY CLERK

SEP 20 2013

DAVID W. PETERSON

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KITSAP COUNTY

CITY OF BREMERTON, a Washington
municipal corporation,

Plaintiff,

vs.

NATACHA SESKO, ESTATE OF WILLIAM
J. SESKO, PACIFIC GUARDIANSHIP
SERVICES, a Washington Corporation, as
Successor Administrator of the Estate of William
J. Sesko and Full Guardian of the Estate of
Natacha H. Sesko, PACIFIC GUARDIANSHIP
SERVICES, a Washington Corporation, NEIL &
NEIL, P.S., a Washington professional services
corporation, J. MICHAEL LIEBERT,
J.MICHAEL LIEBERT PLLC, a Washington
Professional Limited Liability Company,
VANDENBERG, JOHNSON & GANDARA,
LLP, a Washington limited liability partnership,
THE SESKO FAMILY TRUST, JOHN AND
JANE DOES, I THROUGH V, OCCUPANTS
OF THE SUBJECT REAL PROPERTY, AND
ALSO ALL OTHER PERSONS OR PARTIES
UNKNOWN, CLAIMING ANY RIGHT,
TITLE, INTEREST, LIEN OR ESTATE IN
THE PROPERTY HEREIN DESCRIBED,

Defendants.

NO.

16 2 01776 4
COMPLAINT FOR MONIES OWED
AND FORECLOSURE

Plaintiff complains and alleges:

COMPLAINT FOR FORECLOSURE -1

TEMPLETON HORTON WEIBEL PLLC
3212 NW Byron Street Suite 104
Silverdale, WA 98383
Tel (360) 692 9444
Fax (360) 692 1257

BREMERTON-000610

1 1. Plaintiff. The City of Bremerton is a Washington municipal corporation that operates
2 water, sewer and drainage utilities.

3 2. Defendants. The following Defendants have or may claim some interest in the real
4 property that is the subject of this action:

5 a. NATACHA SESKO is a single person residing in Kitsap County, Washington
6 and is the owner of the real property legally described in Exhibit A, Tax Parcel #222401-2-104-2002
7 commonly known as 3530 W. Arsenal Way, Bremerton, WA 98312. ("Property").

8 b. THE ESTATE OF WILLIAM J. SESKO, Deceased, may claim an interest in
9 the Property.

10 c. PACIFIC GUARDIANSHIP SERVICES, as Successor Administrator of the
11 Estate of William J. Sesko and Full Guardian of the Estate of Natacha H. Sesko may claim an interest
12 in the Property.

13 d. PACIFIC GUARDIANSHIP SERVICES, may claim an interest in the
14 Property.

15 e. VANDENBERG, JOHNSON & GANDARA, LLP, a Washington limited
16 liability partnership may claim an interest in the Property.

17 f. NEIL & NEIL, P.S. a Washington corporation, may claim an interest in the
18 Property.

19 g. THE SESKO FAMILY TRUST may claim an interest in the Property.

20 h. J. MICHAEL LIEBERT may claim an interest in the Property.

21 i. J. MICHAEL LIEBERT, PLLC a Washington professional limited liability
22 company may claim an interest in the Property.

23 j. JOHN AND JANE DOES, I THROUGH V, OCCUPANTS OF THE
24 SUBJECT REAL PROPERTY, AND ALSO ALL OTHER PERSONS OR PARTIES UNKNOWN,
25 CLAIMING ANY RIGHT, TITLE, INTEREST, LIEN OR ESTATE IN THE PROPERTY HEREIN
DESCRIBED. The true names of any Defendants designated John Doe or Jane Doe are unknown to
Plaintiff, but said Defendants are, or may be, in possession of the real property hereinafter described.
The Interests of all Defendants identified in the caption herein are junior and subordinate to the
Plaintiff's interest in the above described real property.

 3. The Court has jurisdiction over this matter and venue is proper in Kitsap County as
the real property at issue is situated in Kitsap County.

1 4. Delinquency. The Property's owner is delinquent in payment for utility charges and
2 interest. As of September 2, 2016, the delinquent amount was \$45,973.34.

3 5. Lien. The City of Bremerton recorded a lien on September 24, 2014 with the Kitsap
4 County Auditor under Auditor's File Number 201409240220. It is attached as Exhibit B and
5 incorporated by reference herein.

6 6. Title Search. Plaintiff has been required to incur an expense for a title search as
7 evidence of title in connection with the prosecution of this action.

8 7. Attorney's Fees. A reasonable attorney's fee to be allowed Plaintiff for the prosecution
9 of this action under RCW 35.67.250.

10 8. No Other Action. No other action has been instituted to recover on said obligation or
11 to foreclose said lien.

12 9. Claims of Defendants. The Defendants named in the caption of this pleading, and
13 each of them, claim some right, title, interest, lien or estate in and to said real property, but such
14 claims, if any they have, are subsequent, inferior and junior to the claim of Plaintiff under the claim
15 of lien.

16 10. Possession During Redemption. In the event of foreclosure and sale of the above
17 described property at the foreclosure sale, the purchaser at such sale is entitled to the immediate and
18 sole possession of the property.

19 WHEREFORE, Plaintiff prays for relief as follows:

20 1. That Plaintiff have and recover judgment against the owner of the Property in the
21 principal sum of \$45,973.34, together with interest owing at the default rate of 8.00% per annum from
22 September 4, 2016 to the date of judgment herein;

23 2. That Plaintiff have and recover judgment against the real property above described in
24 for its lien.

25 3. That the lien hereinabove described be adjudged and decreed to be a valid first lien
upon the real property above described.

 4. That the lien be foreclosed and the real property be sold by the Sheriff of Kitsap
County, Washington, in the manner provided by law; and that the proceeds thereof be applied toward
the payment of said judgment and such additional sums as Plaintiff may be required to advance for
taxes, assessments, other items which may constitute liens on the property, insurance, repairs and any
costs of sale, plus interest thereon from the date of payment; that if said proceeds are insufficient to

1 pay said judgment, interest, advances, and costs in full, that Plaintiff have judgment for any deficiency
2 and that said judgment shall bear interest at 8% per annum.

3 5. That Plaintiff be permitted to become a bidder and purchaser at such sale.

4 6. That the Court decree the purchaser at such sale is entitled to the sole and exclusive
5 possession thereof immediately after said sale, together with the rents, issues and profits arising
6 therefrom;

7 7. That by the foreclosure and sale, the rights of each of the Defendants and persons
8 claiming by, through or under them be adjudged inferior and subordinate to the lien and be forever
9 foreclosed except only for the statutory right of redemption allowed by law.

10 8. That the Court decree that the period of redemption from such sheriff's sale be fixed
11 at twelve (12) months from the date of the sheriff's sale; and that the sheriff be ordered to issue the
12 sheriff's deed at the termination of the twelve (12) month period.

13 9. That the Court award Plaintiff its reasonable attorney's fees and costs pursuant to
14 statute or in equity.

15 10. That Plaintiff have such other relief as the Court deems just and equitable.

16 DATED this 7/20/16.

17 TEMPLETON HORTON WEIBEL PLLC

18 
19 DAVID P. HORTON, WSBA #27123
20 3212 NW Byron Street, Suite 104
21 Silverdale, WA 98383
22 (360) 692-6415
23 Attorney for Plaintiff

Exhibit A

Exhibit "A"

Order No.: 32157757

The East 2 acres of the West 3 acres of that portion of the Northeast quarter of the Northwest quarter of Section 22, Township 24 North, Range 1 East, W.M., in Kitsap County, Washington, described as follows:

Beginning 132 feet South and 115 feet West of the Northeast corner of the Southeast quarter of the Northeast quarter of the Northwest quarter of said Section 22; thence West 478.63 feet to a point 65 feet East of the West boundary line of said Southeast quarter of the Northeast quarter of the Northwest quarter; thence along a line parallel with and 65 feet East of said West boundary line South 0°51'52" West 426.38 feet to the North marginal line of County Road; thence along said North marginal line North 75°45'55" East 495.89 feet to an intersection with a line 115 feet West of the North and South center line of said Section; thence North 0°49'53" East 302.50 feet to place of beginning;

Except the West 106.51 feet thereof.

...End of Exhibit "A"...

Exhibit B

RECEIVED

SEP 19 2014

Return Address: City Clerk
City of Bremerton
345 6th Street, Suite 600
Bremerton, WA 98337-1873

City of Bremerton
City Attorney's Office



AUDITOR/RECORDER'S INDEXING FORM

Document Title(s):	1. Utility Lien Notice
Reference Number(s) of Documents assigned or released:	
Grantor(s):	1. Natacha Sesko
<input type="checkbox"/> Additional names on page	_____ of document.
Grantee(s):	1. City of Bremerton
<input type="checkbox"/> Additional names on page	_____ of document.
Legal Description:	The East 2 Acres of the W 3 Acres of the Following Described Parcel in Section 22, T 24 N, (abbreviated) Range 1 E, W.M., Kitsap County, Washington.
<input type="checkbox"/> Additional legal is on page	_____ of document.
Assessor's Property Tax Parcel/Account Number:	222401-2-104-2002

UTILITY LIEN NOTICE
Utility Account No. 41-0470-0

Notice is hereby given that the City of Bremerton has and claims a lien for a combined system of the following: either separately, or any combination of, the utilities for water, sewerage, and drainage. The charges are against the above described premises situated in Kitsap County, Washington.

Said lien is claimed for delinquent charges and interest which have accrued through 9/3/14 in the amount of \$27,638.42 and is also claimed for future water, sewerage, or drainage charges against said premise pursuant to RCW 35.67.200 and Section 15.07.090 of the Bremerton Municipal Code.

DATED this 22ND day of SEPTEMBER, 2014.

CITY OF BREMERNTON
BY: Patty Lent
PATTY LENT, Mayor

APPROVED AS TO FORM:



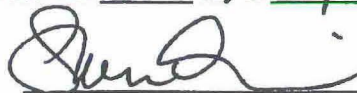
ROGER A. LUBOVICH, City Attorney

STATE OF WASHINGTON)
) ss.
COUNTY OF KITSAP)

On this day, before me appeared Patty Lent, Mayor of the City of Bremerton, the municipal corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said municipal corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute the said instrument on behalf of said municipal corporation.

GIVEN under my hand and official seal this 22nd day of September, 2014.





Notary Public in and for the State of
Washington, residing at Kitsap Co.
My appointment expires: 11-17-15

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SHANNON CORIN, City Clerk

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Rev. 04/2012

BREMERTON-000618